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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSE SANCHEZ FLORES,  
  
Defendant.

Case No. 5:17-cr-00506-BLF

STIPULATION AND [PROPOSED] ORDER  
EXCLUDING TIME

The Defendant Jose Sanchez Flores and the government, by and through undersigned counsel, appeared before the Court on April 27, 2018 for an attorney appointment hearing. The matter was continued to June 12, 2018 at 9:00 AM for a status conference. Counsel for the Defendant requested that time be excluded under the Speedy Trial Act between April 27, 2018 and June 12, 2018 in order to review discovery and conduct necessary investigation. The government has no objection.

Accordingly, Defendant and the United States hereby STIPULATE and AGREE that time under the Speedy Trial Act be excluded from April 27, 2018 and June 12, 2018 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) to allow for effective preparation of counsel, taking into account the exercise of due diligence.

1 Respectfully submitted,

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11 Attorney for Defendant Jose Sanchez Flores

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14 [PROPOSED] ORDER

15 Pursuant to the Stipulation of Defendant Jose Sanchez Flores and the United States, the  
16 representations of counsel, and for good cause shown, the Court finds that failing to exclude the time  
17 between April 27, 2018 and June 12, 2018 would unreasonably deny Defendant continuity of counsel  
18 and would deny counsel the reasonable time necessary for effective preparation, taking into account the  
19 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of  
20 justice served by excluding the time between April 27, 2018 and June 12, 2018 from computation under  
21 the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.  
22 Therefore, IT IS HEREBY ORDERED that the time between April 27, 2018 and June 12, 2018 shall be  
23 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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26 DATED: \_\_\_\_\_

27 THE HONORABLE BETH LABSON FREEMAN  
UNITED STATES DISTRICT JUDGE